

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

Ron Mercer, Kristi Mercer, Ned  
Newhof, Rinda Newhof, and The Fair  
Housing Center of West Michigan,

Plaintiffs,

v.

Edward Rose & Sons, Inc. d/b/a The  
Crossings Apartments and Edward  
Rose Company, severally and jointly,

Defendants.

Case No. 21-11336

Hon. Nancy G. Edmunds  
United States District Judge

**JOINT MOTION TO EXTEND ALL DATES FOR 60 DAYS**

All parties in this matter, through their respective counsel, now jointly Move  
the Court to Extend All Dates for 60 days and state their reasons as follows:

1. Pursuant to the August 25, 2021 Scheduling Order, the deadline for the  
parties to complete discovery is February 7, 2022; and the deadline for the parties to  
file dispositive motions is March 21, 2022.
  
2. The parties have been cooperating to resolve disagreements in  
discovery; however, these matters have taken time and careful attention so as to  
ensure that each party's rights and obligations have been addressed.

3. Now the parties find that the holidays and other complications, including a sudden injury to a deponent and difficulties securing dates, have impeded the parties' abilities to schedule key depositions.

4. The parties agree that there is no prejudice to either side in seeking a modest extension of 60 days to complete depositions and resolve any follow up discovery matters.

Therefore, the parties jointly move for an extension of the Court's August 25, 2021, Scheduling Order, so that fact discovery is extended to **April 8, 2022**, and the dispositive motion deadline is extended to **May 20, 2022**. The parties further request that all other dates be extended by 60 dates from the date set by this Court in its August 25, 2021 Scheduling Order.

**Respectfully Submitted by:**

s/ Robin B. Wagner  
ROBIN B. WAGNER (P79408)  
JENNIFER L. LORD (P46912)  
Pitt, McGehee, Palmer,  
Bonanni & Rivers, PC  
*Attorneys for Plaintiff*  
117 W. Fourth Street, Ste. 200  
Royal Oak, MI 48067  
(248) 398-9800  
rwagner@pittlawpc.com

s/ Haba K. Yono (by consent)  
MATTHEW S. DISBROW (P65378)  
JENNIFER L. MUSE (P81208)  
HABA K. YONO (P81114)  
Honigman LLP  
*Attorneys for Defendants*  
2290 Woodward Avenue  
Detroit, MI 48226  
313-465-7000  
Mdisbrow@honigman.com

Dated: December 16, 2021